category 5 in Appendix C, "Time to Restore and Trouble

Duration," should also include a "POTS" category, in order

to capture information concerning trouble incidents for that

service.

CONCLUSION

AT&T's proposed format for disclosure concerning exchange access and telephone exchange service is only five pages long, and would represent a minimal administrative burden on the BOCs. In light of § 272(e)(1)'s clear and unequivocal nondiscrimination requirement, and the Commission's finding that the information necessary to detect violations of this section will not be available absent data disclosure requirements, this minimal burden is entirely justified.

For the reasons stated above, the Commission's proposed § 272(e)(1) reporting requirements should be modified and adopted as set forth above.

Respectfully submitted,

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EXHIBIT 1

Exhibit I AT&T Comments CC Docket No. 96-149 2/19/97

BOC Provisioning of Exchange Access Services

	Provisioning of Exchan	Outcome for BOC	Outcome for BOC Affiliate
Service Category	Type of Access	10F BOC	10F BOC Anniate
Successful completion according to customer- desired due date (measured as a percentage)	DS3 and Above		
	DS1		
	DSO		
2) Time from customer-desired due date to	DS3 and Above		
circuit being placed in service (% installed	DS1		
within each successive 24 hour period, until 95% installation)	DSO		
3) Time to firm order confirmation	DS3 and Above		
(% received within each successive 24 hour	DS1		
period, until 95% completed)	DSO		
4) Time from PIC change request to implementation (% implemented within each successive 6 hour period, until 95% implementation)	By CIC (10XXX) code		
5) Time to restore and trouble duration (%	DS3 and Above		
restored within each successive 1 hour interval,	DS1		
until resolution of 95% of incidents)	DSO		
	POTS		
Time to restore PIC after trouble incident (% restored within each successive I hour interval, until resolution of 95% of incidents)	By CIC (10XXX) code		
7) Mean time to clear network/average	DS3 and Above		
duration of trouble (hours)	DS1		
	DSO		
8) Jeopardy notification provided (notifications	DS3 and Above		
received more than 24 hours before scheduled	DS1		
deadline divided by total orders for which deadline missed}	DSO		
9) Incidence of new circuit failures (% failed	DS3 and Above		
within 30 days of installation)	DS1		
	DSO		
10) Failure frequency (% of circuits purchased by	DS3 and Above		
carrier that have experienced a trouble	DS1		
occurrence within calendar month)	DSO		
11) Network repeat failure within 30 days	DS3 and Above		
of initial trouble (% of circuits experiencing	DS1		
repeat failures within 30 days of a prior trouble report)	DSO		

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EXHIBIT 2

Exhibit 2 AT&T Comments CC Docket No. 96-149 2/19/97

BOC Provisioning of Telephone Exchange Services

	Provisioning of Telephone Exchi		Outcome for BOC
Service Category	Towns of Coming on Equility	Outsome for POC	
Service Category	Type of Service or Facility	Outcome for BOC	Affiliate
1A) Time from request to time	Resold POTS		
service/element is operable - no	Resold ISDN		
premises visit or software-only changes	Resold Centrex / Centrex-like		
(% received within each successive 24	Resold PBX trunks	<u> </u>	
hour period, until 95% completed)	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
ł	switch + transport elements)		
,	UNE Channelized DS1 (DS1 loop +		
	multiplexing)		
	Unbundled DS0 Loop		
1	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
<u> </u>	Other UNEs		
1B) Time from request to time	Resold POTS		
service/element is operable - premise	Resold ISDN		
visit required or other than software-only	Resold Centrex / Centrex-like		
changes (% received within each	Resold PBX trunks		
successive 24 hour period, until 95%	Resold Channelized T1.5 Service		
completed)	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
	switch + transport elements)		
ł	UNE Channelized DS1 (DS1 loop +		
	multiplexing)		
(Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
J	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
2) Successful completion according to	Resold POTS		
customer-desired due date (measured as a	Resold ISDN		
percentage)	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
	switch + transport elements)		
	UNE Channelized DS1 (DS1 loop +		
	multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
	Physical Collocation		
	Virtual Collocation		

<u> </u>			Outcome for BOC
Service Category	Type of Service or Facility	Outcome for BOC	Affiliate
3) Time to firm order confirmation	Resold POTS		
(% received within each successive 1 hour period, until 95% completed)	Resold ISDN		
	Resold Centrex / Centrex-like		
i	Resold PBX trunks		
}	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
	switch + transport elements)		
1	UNE Channelized DS1 (DS1 loop +		
	multiplexing)		
ì	Unbundled DS0 Loop		
ļ	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
4	Unbundled Switch		
j	Other UNEs		
	Physical Collocation		
<u></u>	Virtual Collocation		
4) Mean time to clear network/average	Resold POTS		
duration of trouble (hours)	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
	switch + transport elements)		
	UNE Channelized DS1 (DS1 loop +		
	multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
5A) Response intervals for successful pre-	Telephone Number Reservation		
order queries (% received within each	Due Date Reservation		
successive 1 second period,	Feature Function Availability		
until 95% completed)	Facility Availability		
	Street Address Validation		
	Service Availability Information		
	Appointment Scheduling		
5B) Response intervals for successful pre-	Customer Service Records (CSR)		
order inquiries (% received within each		}	
successive 5 minute period, until 95%			
completed)			
5C) Percentage of time interface is available	Pre-Order Inquiries Interface		
during business hours (total hours	Ordering Interface		
interface is actually available 8:00 a.m.	Maintenance Interface		
through 6:00 p.m., Monday through			
Friday, divided by 50)			

Samina Catagony	Type of Somine on Facility	Outcome for BOC	Outcome for BOC Affiliate
Service Category	Type of Service or Facility	Outcome for BOC	Aimate
6) Time from recording to successful delivery	Resold Local Exchange Services		
of exchange message record (EMR)	Unbundled Switch (with or w/o other		
records (% completed within each 24	UNEs)	}	
hour period, until 95% delivered)	n H norg		
7) Time to restore and trouble duration	Resold POTS		
(% restored within each successive 1 hour	Resold ISDN		
interval, until resolution of 95% of	Resold Centrex / Centrex-like		
incidents)	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
	switch + transport elements)		
	UNE Channelized DS1 (DS1 loop +	,	
	multiplexing) Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
0. 31.4 1 4.6 11 21.1 20.1	<u> </u>		
8) Network repeat failure within 30 days	Resold POTS		
of initial trouble (% of services/elements	Resold ISDN		
experiencing repeat failures within 30	Resold Centrex / Centrex-like		
days of a prior trouble report)	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local	,	
	switch + transport elements)		
	UNE Channelized DS1 (DS1 loop + multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
(1) Iconomic meticostica manifest	Resold POTS		
9) Jeopardy notification provided (notifications received more than 24 hours	Resold ISDN		
before scheduled deadline divided by total	Resold Centrex / Centrex-like		
orders for which dealine missed)	Resold PBX trunks		
orders for which deathle missed)	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local switch + transport elements)		
	UNE Channelized DS1 (DS1 loop +		
	multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
	Ouici Oives		

Service Category	Type of Service or Facility	Outcome for BOC	Outcome for BOC Affiliate
10) Incidence of new service/element	Resold POTS		
failures (% failed within 30 days of installation)	Resold ISDN		
	Resold Centrex / Centrex-like		
	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
	switch + transport elements)		
	UNE Channelized DS1 (DS1 loop +		
	multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
11) Failure frequency (% of services/elements	Resold POTS		
purchased by carrier that have	Resold ISDN		
experienced a trouble occurrence within	Resold Centrex / Centrex-like		
calendar month)	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
	switch + transport elements)		
	UNE Channelized DS1 (DS1 loop +		
	multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		
12) Completion notifications returned	Resold POTS		
(% of completion notices delivered within	Resold ISDN		
each successive 24 hour period following	Resold Centrex / Centrex-like		
completion, until 95% notifications)	Resold PBX trunks		
	Resold Channelized T1.5 Service		
	Other Resold Services		
	UNE Platform (at least DS0 loop + local		
	switch + transport elements)		
	UNE Channelized DS1 (DS1 loop +		
İ	multiplexing)		
	Unbundled DS0 Loop		
	Unbundled DS1 Loop (unchannelized)		
	Other Unbundled Loops		
	Unbundled Switch		
	Other UNEs		